

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

Rochelle Isom Plaintiff )  
vs. ) Case No. 01-4057-CV-C-5  
(1) Mid-MO Mental Health Center )  
(2) \_\_\_\_\_ )  
(3) \_\_\_\_\_ Defendant(s).

COMPLAINT

Comes now plaintiff, Rochelle Isom  
and for his/her claim against the defendant(s) Mid-Missouri Mental  
Health Center  
states and alleges as follows:

1. This action is brought and jurisdiction lies pursuant to 42 U. S. C.  
Section 2000e-5. Venue is proper in this district;

2. Plaintiff is a African-American Female,  
(Race) (Sex)  
who resides at 1003 Washington Ave Columbia  
(Street Address) (City)  
Missouri 65201  
(State) (Zip Code)

3. The defendant (1) Mid-Missouri Mental Health Center  
is an employer, employment agency, or labor organization, as defined in 42 U.S.C.  
Section 2000e, and is located at 3 Hospital Drive  
Columbia, MO 65201  
(Address)

NOTE: USE THIS PAGE ONLY IF THERE IS MORE THAN ONE DEFENDANT!

3a. the defendant (2) \_\_\_\_\_  
is an employer, employment agency, or labor organization, as defined in 42 U.S.C.  
Section 2000e, and is located at \_\_\_\_\_  
\_\_\_\_\_  
(Address)

3b. the defendant (2) \_\_\_\_\_  
is an employer, employment agency, or labor organization, as defined in 42 U.S.C.  
Section 2000e, and is located at \_\_\_\_\_  
\_\_\_\_\_  
(Address)

3c. the defendant (2) \_\_\_\_\_  
is an employer, employment agency, or labor organization, as defined in 42 U.S.C.  
Section 2000e, and is located at \_\_\_\_\_  
\_\_\_\_\_  
(Address)

3d. the defendant (2) \_\_\_\_\_  
is an employer, employment agency, or labor organization, as defined in 42 U.S.C.  
Section 2000e, and is located at \_\_\_\_\_  
\_\_\_\_\_  
(Address)

3e. the defendant (2) \_\_\_\_\_  
is an employer, employment agency, or labor organization, as defined in 42 U.S.C.  
Section 2000e, and is located at \_\_\_\_\_  
\_\_\_\_\_  
(Address)

4. On or about June 22, 2001, defendant(s)

(Specify the unlawful employment practice which you are alleging against the defendant(s), such as: Refusal to hire, discharge from employment, harassment in

Harassment by Director of Environmental

Services for reporting hostile work

environment. (Sent home written up wrongly)

To discourage me from reporting again. Plaintiff ensured  
because of (state why defendant(s) discriminated against you, i.e., race, color, <sup>Severely</sup> religion, sex, or national origin, etc.)

Because of my sex/gender defendant harassed me. Instead of correcting male co workers for hostile  
better to retaliate against a woman from an angry man and a male

5. Plaintiff timely filed a written complaint of discrimination with the Equal Employment Opportunity Commission and received a right-to-sue letter, a copy of which is attached. All conditions precedent to the institution of this lawsuit have been fulfilled.

Wherefore, plaintiff prays for (state what relief is sought):

Compensatory damages, pain and suffering  
mental anguish and all other appropriate  
relief.

and such other relief as the court would allow under Title VII of the Civil Rights Act of 1964.

Lochelle Horn

Signature

603 Washington Ave  
Street Address

Columbia MO 65201  
City State Zip Code

(573) 815-0693  
Telephone